Case 2:24-cv-00287-WBS-CKD Document 58-1 Filed 09/20/24 Page 1 of 2

1	PHILLIP A. TALBERT United States Attorney DAVID E. THIESS STEVEN S. TENNYSON Assistant United States Attorneys 501 L Street Suite 10, 100			
2				
3				
4	501 I Street, Suite 10-100 Sacramento, CA 95814 Telephone: (916) 554-2700 Facsimile: (916) 554-2900			
5				
6	David.Thiess@usdoj.gov Steven.Tennyson2@usdoj.gov			
7	Attorneys for the United States of America			
8	UNITED STATES DISTRICT COURT			
9	EASTERN DISTRICT OF CALIFORNIA			
10				
11	UNITED STATES OF AMERICA,	No. 2:24-cv-00287-WBS-CKD		
12	Plaintiff,	DECLARATION IN CURRORT OF		
13	v.	DECLARATION IN SUPPORT OF PLAINTIFF'S REQUEST FOR ENTRY OF DEFAULT		
14	MATTHEW H. PETERS, et al.			
15	Defendants.			
16				
17	I, Steven S. Tennyson, hereby declare:			
18	1. I am an Assistant United States Attorney with the U.S. Department of Justice, United			
19	States Attorney's Office for the Eastern District of California. Together with Assistant United States			
20	Attorney David Thiess, I am counsel in this matter for Plaintiff the United States of America.			
21	2. This affidavit is offered in support of Plaintiff's Request for Entry of Default by the Clerk			
22	Against Defendants Inland Medical Consultants LLC, Professional Rx Pharmacy LLC, Strand View			
23	Enterprises LLC, Synergy Medical Systems LLC, Synergy RX LLC (the "Defaulted Parties").			
24	3. On January 22, 2024, the United States filed its Complaint (ECF No. 1). The United			
25	States filed a First Amended Complaint pursuant to Rule 15(a) of the Federal Rules of Civil Procedure			
26	on March 18, 2024 (ECF No. 5). Pursuant to Rule 4 of the Federal Rules of Civil Procedure, the United			
27				
	REQUEST FOR ENTRY OF DEFAULT 1			
I	TECTOR DELICITION TO THE TOTAL			

Case 2:24-cv-00287-WBS-CKD Document 58-1 Filed 09/20/24 Page 2 of 2

States served the Defaulted Parties with the Summons and First Amended Complaint on the following dates:

Party	Date Served	ECF No.
Inland Medical Consultants LLC	April 2, 2024	(Dkt. 13 at 1)
Professional Rx Pharmacy LLC	April 9, 2024	(Dkt. 13 at 7)
Strand View Enterprises LLC	August 26, 2024	(Dkt. 54 at 1) (Dkt. 13 at 15) ¹
Synergy Medical Systems LLC	April 5, 2024	(Dkt. 14 at 14)
Synergy RX LLC	April 5, 2024	(Dkt. 25 at 11)

4. As of the date of this Request, the United States has not received a responsive pleading from any of the Defaulted Parties, nor is there record of an answer or other response entered on the Court's electronic docket.

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 20th day of September 2024, in Sacramento, California.

Respectfully submitted,

<u>Steven Tennyson</u> STEVEN S. TENNYSON Assistant United States Attorney

¹ The United States served Strand View Enterprises LLC twice to correct a typographical error in the defendant's name.